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Attorneys for Plaintiff Pearson Education, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PEARSON EDUCATION, INC.,)	
)	
Plaintiff,)	Civ. Action No. 2:21-cv-16866-SDW-ESK
)	
v.)	
)	DECLARATION OF
)	NICHOLAS C. HAILEY
CHEGG, INC.,)	IN SUPPORT OF PRO HAC VICE
)	ADMISSION
Defendant.)	

I, Nicholas C. Hailey, Esq., hereby declare as follows:

1. I am an attorney at the law firm of Oppenheim + Zebrak, LLP, having offices located at 4530 Wisconsin Avenue, NW, 5th Floor, Washington, DC 20016.

2. I submit this declaration in support of the request of Plaintiff, Pearson Education, Inc., for the entry of an Order permitting me to appear and participate in the instant matter pursuant to L. CIV. R. 101.1 of the Rules of the United States District Court for the District of New Jersey.

3. I am an attorney-at-law and a member in good standing of the Virginia State Bar (Admitted: October 12, 2012). The office and address of the official maintaining the roll of members for the Virginia State Bar is: 1111 East Main Street, Suite 700, Richmond, VA 23219.

4. I am also a member in good standing of the Bar of the District of Columbia (Admitted: February 3, 2014). The office and address of the official maintaining the roll of members for the D.C. Bar is: 901 4th Street, NW, Washington, DC 20001.

5. I am not currently, nor have I ever been, suspended or disbarred by any court. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me, by any court in any jurisdiction.

6. Pursuant to L. CIV. R. 101.1(c), I have designated Karen A. Confoy, Esq., of the law firm of Fox Rothschild, LLP, having offices located at 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648, who is a member in good standing of the Bar of this Court and who maintains an office within this district, as the attorney of record with whom the Court and opposing counsel may readily communicate regarding the conduct of this case.

7. Pursuant to L. CIV. R. 101.1(c)(5), and if admitted to practice before this Court *pro hac vice*, I will abide by the Rules of Disciplinary Procedures of this Court, and I will submit to the jurisdiction of this Court for any disciplinary issues. The law firm of Fox Rothschild LLP has agreed to work as New Jersey local counsel with my firm in connection with this action.

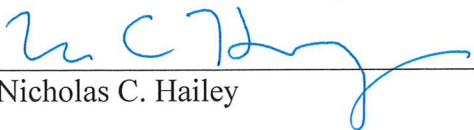
8. If admitted to practice before this Court *pro hac vice*, I agree not to take any fee in any tort case in excess of New Jersey Court Rule 1:21-7, governing contingent fees.

9. If admitted to practice before this Court *pro hac vice*, I agree to make all payments required under L. Civ. R. 101.1.

10. I am familiar with the Local Civil Rules of the United States District Court for the District of New Jersey, and I will abide by those Rules.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2021
Washington, DC



Nicholas C. Hailey